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*Attorneys for Defendants
John Roop and Richard Linford*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT JACKSON,

Plaintiff,

v.

NDOC, *et al.*,

Defendants.

Case No. 2:21-cv-01772-JAD-EJY

**~~PROPOSED~~ REVISED DISCOVERY
PLAN AND SCHEDULING ORDER**

Pursuant to this Court's Order dated October 24, 2023 (ECF No. 47), following the entry of the Order Granting in Part, and Denying in Part Defendants' Motion for Judgment on the Pleadings or in the Alternative Early Summary Judgment (ECF No. 51), Plaintiff Robert Jackson, *pro se*, and Defendants John Roop and Richard Linford,¹ by and through counsel, Aaron D. Ford, Nevada Attorney General, and Leo T. Hendges, Senior Deputy Attorney General, hereby stipulate and agree to entry of a proposed revised discovery plan and scheduling order as follows:

The Parties propose the following schedule for completion of all remaining discovery and the filing of any dispositive motions:²

¹ Defendants Jennifer Nash and Duane Wilson were dismissed for failure to exhaust administrative remedies. ECF No. 51 at 9:18-10:1.

² The parties aim to utilize the same timelines outlined in the original scheduling order at ECF No. 25.

- 1 • The parties shall have 180 days to complete discovery from August 23, 2024,
2 and discovery will close on **Wednesday, February 19, 2025**. Discovery must
3 be served at least 30 days prior to the discovery cut-off deadline.
4 Interrogatories under Fed. R. Civ. P. 33(a)(1), Requests for Production of
5 Documents under Fed. R. Civ. P. 34(a)(1), and Requests for Admission under
6 Fed. R. Civ. P. 36(a)(1) are limited to 25 requests per party. A party receiving
7 more than 25 separate requests is not required to answer.
- 8 • A party seeking to amend a complaint or answer more than 21 days after the
9 complaint or answer was initially filed must file a motion under Fed. R. Civ.
10 P. 15(a)(2) explaining why the amendment is sought, whether there will be
11 any prejudice to the other party or parties if amendment is granted and, if
12 there was a delay in seeking the amendment, what caused that delay. A
13 motion to amend **must also** comply with Local Rule 15-1 requiring the
14 proposed amended complaint or answer be attached to the motion. In this
15 case, no proposed amendment may be filed after 60 days from August 23,
16 2024, meaning they must be filed by **October 22, 2024**.
- 17 • The deadline for expert disclosures will be 60 days before the close of
18 discovery, or **December 20, 2024**,³ and the disclosures of rebuttal experts will
19 be due **January 20, 2025**.
- 20 • Discovery motions must be filed and served no later than 21 days after the
21 close of discovery, or **March 12, 2025**. **Before filing a discovery motion,**
22 **such as a motion to compel, the parties must first make good faith**
23 **efforts to resolve any dispute by speaking with each other. For**
24 **Plaintiff, this means you must write to Defendant's lawyer and**
25 **explain your concerns. You may ask Defendant's counsel to assist in**
26 **setting up a telephone call during which the parties will discuss their**
27 **disagreements and attempt to resolve their dispute. Defendant must**

28 ³ 60 days before the close of discovery would fall on Saturday, December 21, 2024.

initiate a call to Plaintiff before filing a discovery motion as well. All discovery motions must include a declaration that the party filing the motion has, in good faith, spoken with or attempted to speak with the opposing party in an effort to resolve their differences without a Court order; and the Court may choose to not consider a discovery motion unless the party filing the motion has made a good-faith effort to resolve all disagreements that are raised in a motion.

- The deadline to file any dispositive motions is 30 days after the close of discovery, or **March 21, 2025**.
- The deadline to file a Joint Pre-Trial order is 30 days after the dispositive motion deadline, or **April 21, 2025**,⁴ however, if dispositive motions are filed, thirty (30) days after the entry of any order on the dispositive motions.

The parties respectfully request that this Court enter the deadlines as outlined above.

DATED this 20th day of August, 2024.

DATED this 20 day of August, 2024.

AARON D. FORD
Attorney General

/s/ Leo T. Hendges
LEO T. HENDGES (Bar No. 16034)
Senior Deputy Attorney General
Attorneys for Defendants


ROBERT JACKSON, #86238
Plaintiff, Pro Se

ORDER

IT IS SO ORDERED:

DATED: August 23, 2024


UNITED STATES MAGISTRATE JUDGE

⁴ 30 days after the dispositive motion deadline is Sunday, April 20, 2025.